

247163

June 24, 2003

Docket Management
Room PL-401
400 Seventh Street, S.W.
Washington, D.C. 20590

DEPT. OF TRANSPORTATION
DOT-408

2003 JUN 20 P 3:06

Reference: Docket NHTSA 2003-14375 - 35

Ladies and Gentlemen:

This letter is my personal comment to Docket Number NHTSA 2003-14375, specifically the proposal by the National Highway Traffic Safety Administration to study "Characteristics of Motorcycle Operators." with a stated deadline for public comment of 30 June 2003.

Under OMB's regulations [at 5 CFR 1320.8(d)], an agency must ask for public comment on the following:

(i) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

I agree that collection of information is necessary for NHTSA to perform the function it was founded to do. However, the limited scope of this proposed investigation in relation to not only the number of people, but also the geographic location of this proposed study guarantees that the results WILL be skewed and not indicative of the overall motorcycling population of the United States.

(ii) The accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methods and assumptions used;

The accuracy of how long these interviews will take is probably right on the money, but because of the reasons previously stated, the validity and even more importantly, the assumptions that will be derived from these interviews will be too limited and not a true representation of this nations motorcyclists.

(iii) How to enhance the quality, utility, and clarity of the information to be collected; and

(iv) How to minimize the burden of the collection of information on those who are to respond, including the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

Here's where the rubber meets the road and this is why I have group these last two together.

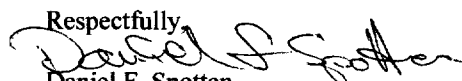
A true real-time study of motorcycle accidents is needed. This could easily be done by gathering accident data from all 50 states, entering all that information into a database and by sorting and filtering, develop real-time real world trends as to "why" motorcycle accidents are happening to begin with. This original data would not come from pre-filtered statistics put out by state safety agencies – but from copies of the original police reports. From these reports, issues such as weather, time of day, road hazards, other vehicles involved, operators licensed and safety equipment used could be part of the overall database. This study would also HAVE to include list of ALL injuries incurred in the accidents as well as the cause of death if that was the case.

Most important, would be that copies of ALL the original reports be easily accessible to Motorcycle Rights Organizations to fund their own studies to insure that the statistics put forth by NHTSA are true and not skewed in any way.

NHTSA has shown in the past to have a penchant for (1) bending the rules by lobbying in the Statehouse's of ALL 50 states and (2) ignoring the causes of motorcycle accidents in favor of the antiquated notion that "helmet's save lives" instead of focusing on "preventing the accident" to begin with. It's past time that NHTSA get with the program and JOIN with motorcyclists in an effort to find out the true causes of motorcycle accidents and work to prevent them from happening in the first place.

In closing, I oppose this proposed study. My reasons are that this will be a complete waste of time and the taxpayer's money as the results will be skewed because of the limited scope of the proposed study.

Respectfully,


Daniel F. Spotten
512 Liberty
Pella, Iowa, 50219

June 24, 2003

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Room PL-401
400 Seventh Street, S.W.
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DEPT. OF TRANSPORTATION

2003 JUN 30 P 4:17

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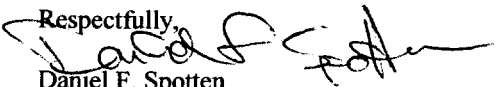
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